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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

THOMAS ROMSPERT

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Criminal No.

21-59

(18 U.S.C. §§ 2251(a) and 2251(e))

INDICTMENT

COUNT ONE

The grand jury charges:

On or about July 19, 2020, in the Western District of Pennsylvania, the defendant, THOMAS ROMSPERT, attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and would be transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

The grand jury further charges:

On or about August 16, 2020, in the Western District of Pennsylvania, the defendant, THOMAS ROMSPERT, attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and would be transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

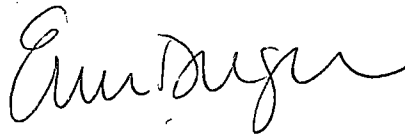
COUNT THREE

The grand jury further charges:

On or about September 28, 2020, in the Western District of Pennsylvania, the defendant, THOMAS ROMSPERT, attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and would be transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

A True Bill,



FOREPERSON



SCOTT W. BRADY
United States Attorney
PA ID No. 88352